

GREENE CONSUMER LAW

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July 21, 2025

Hon. Katherine Polk Failla
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *Morris et al. v. Kenneth Dean Sugarman et al.*
Case No. 23 Civ. 9327 (KPF)

Dear Judge Polk Failla:

I am co-counsel for the plaintiffs. On June 5, 2025, the Court set August 4, 2025 as the deadline to complete all fact discovery. [Doc. 85.] I am writing to request additional time after the close of fact discovery for expert discovery. Plaintiffs intend to name an expert to opine on the emotional distress damages suffered by plaintiff Kimberly Morris.

After conferring with defendant's counsel, Arthur Sanders, the parties have agreed on the following dates for expert discovery:

August 4, 2025: Plaintiffs' deadline to identify their expert.

August 11, 2025: Plaintiffs' deadline to serve an expert report.

September 8, 2025: Defendant's deadline to depose plaintiffs' expert.

September 29, 2025: Defendant's deadline to object to the admissibility of Plaintiffs' expert report.

September 29, 2025 Defendant's deadline to identify his expert.

October 6, 2025 Defendant's deadline to serve his expert's report.

November 3, 2025 Plaintiffs' deadline to depose Defendant's expert.

November 24, 2025 Plaintiff's deadline to object to the admissibility of Defendant's expert report.

Wherefore, plaintiffs respectfully request that the Court enter the foregoing expert discovery schedule.

Respectfully submitted,

/s/ Francis R. Greene

Application GRANTED *nunc pro tunc*. The Court adopts the above-described expert discovery schedule. The Court will not extend these expert discovery deadlines absent compelling circumstances.

The Clerk of Court is directed to terminate the pending motion at docket entry 86.

Dated: July 22, 2025
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE